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6 *Representing the United States of America*

7
8 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 JOSEPH GIULIANO,

14 Defendant.

Case No. 2:14-cr-371-HDM-DJA

ORDER GRANTING
ELEVENTH STIPULATION TO
CONTINUE SENTENCING

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17 The United States of America, through Nicholas A. Trutanich, United States Attorney,
18 and Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph Giuliano,
19 by and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly move this
20 Honorable Court to vacate the sentencing hearing set for Tuesday, February 18, 2020 at 9:00
21 a.m. and reset the sentencing proceedings in this matter at a date six (6) months from the
22 current setting.

23 The parties make this stipulation and motion for good cause and not for the purposes of
24 delay. The possibility remains that defendant Giuliano may be called to testify in proceedings

1 in a related case or assist in other matters, pursuant to his plea agreement. The parties agree
2 that it is in the interest of justice to defer sentencing until those related matters have been
3 resolved. Defendant Giuliano believes it is in his best interest to do so.

4 Defendant Giuliano is not in custody and agrees to this continuance.

5 Denial of this request for continuance could result in a miscarriage of justice.

6 This is the eleventh request to continue sentencing in this matter.

7 The parties respectfully request this Honorable Court issue the attached proposed Order
8 to accomplish these ends.

9 Dated December 30, 2019

10 NICHOLAS A. TRUTANICH
11 United States Attorney

12 _____
13 SHAWN R. PEREZ, ESQ.
14 Counsel for Defendant JOSEPH
15 GIULIANO

12 _____
13 DANIEL J. COWHIG
14 Assistant United States Attorney

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4 UNITED STATES DISTRICT COURT
5 DISTRICT OF NEVADA

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7 UNITED STATES OF AMERICA,

Case No. 2:14-cr-371-HDM-DJA

8 Plaintiff,

9 vs.

ORDER

10 JOSEPH GIULIANO,

11 Defendant.

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13 **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

14 Based on the stipulation of the parties and the record in these matters, the Court finds that the
15 parties make this stipulation and motion for good cause and not for the purposes of delay. The
16 possibility remains that defendant Giuliano may be called to testify in proceedings in a related
17 case or in other matters, pursuant to his plea agreement. The parties agree that it is in the
18 interest of justice to defer sentencing until those related matters have been resolved. Defendant
19 Giuliano believes it is in his best interest to do so.

20 Defendant Giuliano is not in custody and agrees to this continuance.

21 Denial of this request for continuance could result in a miscarriage of justice.

22 This is the eleventh request to continue sentencing in this matter.

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